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TO: comments-pacificnorthwest-wallowa-whitman-whitmanunit@fs.fed.us

ATTN: Jeff Tomac, Whitman Ranger District, and Sophia Miller

DATE: 10 Nov 2011

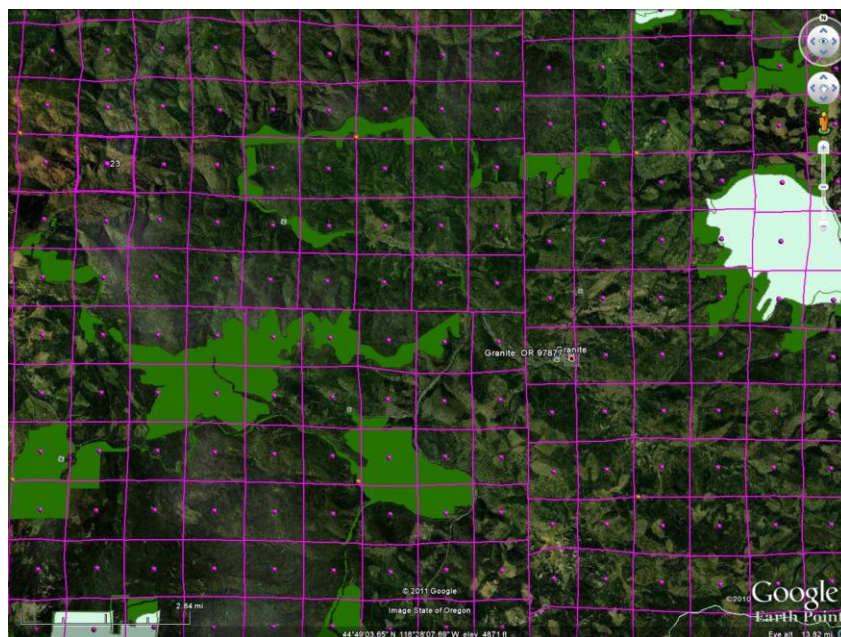
RE: Granite Creek Watershed Mining NOI - scoping comments

Please accept the following scoping comments from Oregon Wild regarding the proposed EIS for Granite Creek Watershed Mining Projects which would authorize up to 30 mining plans of operation each involving typically 1-2 acres per year of excavation and reclamation. The project area spans portions of the Wallowa-Whitman National Forest and the Umatilla National Forest. Area streams harbor ESA-listed bull trout and middle Columbia steelhead, and several streams are water quality limited for temperature and/or sediment.

We urge the FS to do its utmost to protect soil, water quality and quantity, fish & wildlife habitat, native vegetation, scenic values, and carbon storage by imposing strict conditions on proposed mining plans that will avoid, minimize, and fully mitigate ALL adverse effects from mining.

The DEIS should explain clearly how mining activities will avoid adverse effects to water quality and ESA-listed fish. Ideally, 401 certification and ESA consultation should be open public processes.

There are critically important wilderness and roadless values at stake within the project area. We urge the FS to fully disclose the effects of mining on wilderness, inventoried roadless area, and other ecologically significant unroaded areas (>1,000 acres) shown in shades of green on the following map:



We urge the FS to develop an alternative that would fully meet the PACFISH mandates to "avoid adverse effects to listed species and designated critical habitat from mineral operations" (MM-1) and "For each existing or planned road, meet riparian management objectives, and avoid adverse effects on listed anadromous fish ..." (RF-2).

Adverse effects from road work, excavation, and water use are among our most significant concerns. These may irreparably change hydrology, habitat, and spread weeds.

The FS should consider limiting miners to using hand tools. If the miners wish to invoke a law from 1972, maybe they should be limited to the tools from the same time period. Backhoes and bulldozers can do so much more environmental damage to our public lands than picks and shovels.

Please send us a copy of the DEIS when it is available.

Sincerely,
/s/

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